

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: William C. Doyle

: NO. 16-13375 sr

: CHAPTER 13

Response to Motion for Relief filed by SETERUS INC.

Debtor, by and through her attorney, responds as follows:

1-5. Admitted.

6-10.. Admitted in part and Dewnied in part. Debtor's First Debtor to pay the Movant in full ad the unsecured creditors at or near 100%. Movant is adequately protected since there is equity in the real estate and the sale of the real estate is necessary to an effective reorganization.

WHEREFORE, it is respectfully requested that the Motion be DENIED.

By: /S/Michael P. Kelly